

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FRANCES A. WOOD,

Plaintiff,

Case No.

Hon:

v

WAYNE COUNTY AIRPORT AUTHORITY,
a governmental entity,

Defendant.

James K. Fett (P39461)
Fett & Fields, P.C.
407 North Main Street, 2nd Floor
Ann Arbor, MI 48104
734-954-0100
Fax: 734-954-0762
jim@fettlaw.com
Attorney for Plaintiff

PLAINTIFF'S COMPLAINT AND JURY DEMAND

Plaintiff, through counsel, Fett & Fields, P.C., states the following claims against Defendant:

NATURE OF CLAIM

1. This is a *Fourteenth Amendment, 42 U.S.C. §1983 Equal Protection* action for wrongful termination and denial of promotions based on Plaintiff's Caucasian race.

JURISDICTION AND PARTIES

2. Plaintiff invokes the jurisdiction of this Court pursuant to *28 U.S.C. §§1331*.

3. The events giving rise to this cause of action occurred in the Eastern District of Michigan.

4. The amount in controversy exceeds \$75,000.00, exclusive of interest, costs and attorney fees.

5. Plaintiff is a White female, a citizen of the United States and the State of Michigan.

6. Defendant, Wayne County Airport Authority (the “Authority”), hired her in 2013 as its “Customer Experience Program Manager.”

COUNT I
PROMOTIONAL RACE DISCRIMINATION IN VIOLATION OF
42 U.S.C. §1983 (FOURTEENTH AMENDMENT EQUAL PROTECTION)

7. Plaintiff incorporates by reference the preceding paragraphs.

8. Plaintiff was a high-performing manager with the Authority.

9. The Authority, acting under the color of state law, when it jump-started its standard operating procedure (pattern and practice) of racial preferences in the terms and conditions of employment (as described above), much to the detriment of White employees.

10. Defendant deprived Plaintiff of her right to Equal Protection as guaranteed by the *14th Amendment to the United States Constitution* by denying her promotions because she is White.

11. Defendant’s management are the usual governmental officials that discriminate against White employees.

12. Defendant’s illegal race discrimination has caused Plaintiff damages.

WHEREFORE, Plaintiff requests that this Court enter judgment against Defendant for:

- a. Economic damages;
- b. Non-economic damages to compensate for the mental and emotional distress, outrage, and humiliation she has suffered, and continues to suffer, as a result of Defendant’s illegal actions;
- c. Costs, interest and reasonable attorney fees as provided by 42 U.S.C. §1988;
- d. Punitive damages against Defendant;

- e. A declaration that Defendant's conduct as described above violates the federal constitution and statutes; and
- g. Such other equitable relief as the Court deems just.

COUNT II
WRONGFUL TERMINATION BASED ON RACE IN VIOLATION OF 42
U.S.C. §1983 (FOURTEENTH AMENDMENT EQUAL PROTECTION)

13. Plaintiff incorporates by reference the preceding paragraphs.

14. Plaintiff was a high-performing White female manager with a sterling employment record until wrongfully terminated by Defendant on June 6, 2022.

15. Defendant was acting under the color of state law when it jump-started the Authority's standard operating procedure (pattern and practice) of racial preferences in the terms and conditions of employment (as described above), much to the detriment of White employees.

16. Defendant deprived Plaintiff of her right to Equal Protection as guaranteed by the *14th Amendment to the United States Constitution* by terminating her employment for pretextual reasons based on her status as a White female.

17. Defendant managers are the usual governmental officials that discriminate against White females.

18. Defendant's illegal race discrimination has caused Plaintiff damages.

WHEREFORE, Plaintiff requests that this Court enter judgment against Defendant for:

- a. Economic damages;
- b. Non-economic damages to compensate for the mental and emotional distress, outrage, and humiliation she has suffered, and continues to suffer, as a result of Defendant's illegal actions;
- c. Costs, interest and reasonable attorney fees as provided by 42 U.S.C. §1988;
- d. Punitive damages against Defendant;

- e. A declaration that Defendant's conduct as described above violates the federal constitution and statutes; and
- f. Such other equitable relief as the Court deems just.

Respectfully submitted,

/s/ James K. Fett

By: James K. Fett (P39461)
Fett & Fields, P.C.
407 North Main Street, 2nd Floor
Ann Arbor, MI 48104
734-954-0100
jim@fettlaw.com
Attorneys for Plaintiff

Dated: July 15, 2022

JURY DEMAND

NOW COMES Plaintiff Frances A. Wood, through her counsel Fett & Fields, P.C., and hereby demands trial by jury in the above-captioned matter.

/s/ James K. Fett

By: James K. Fett (P39461)
Fett & Fields, P.C.
407 North Main Street, 2nd Floor
Ann Arbor, MI 48104
734-954-0100
jim@fettlaw.com
Attorneys for Plaintiff

Dated: July 15, 2022